Department of Toxic Substances Control

Maureen F. Gorsen, Director
8800 Cal Center Drive
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Linda S. Adams
Secretary for
Environmental Protection

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Governor

October 26, 2006

Mr. Arthur Lenox
Environmental Remediation
Santa Susana Field Laboratory
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INCOMPLETE SUBMITTAL OF THE RCRA FACILITY INVESTIGATION, DRAFT WORKPLAN, AREA I BURN PIT, SANTA SUSANA FIELD LABORATORY (SSFL), VENTURA COUNTY

Dear Mr. Lenox:

The Boeing Company (Boeing) submitted to the Department of Toxic Substances Control (DTSC) a Resource Conservation Recovery Act Facility Investigation (RFI) Draft Workplan for the Area I Burn Pit (AIBP) dated September 29, 2006. DTSC directed Boeing to prepare the RFI Workplan as a result of historical documentation provided by Boeing to DTSC on August 16 and 18, 2006, which indicated types and sources of wastes were received at the AIBP from offsite sources and from onsite sources other than rocket testing related operations at SSFL. In our August 30, 2006 letter, we required Boeing prepare a new Workplan which adequately characterizes the chemical contamination in the AIBP and surrounding areas in light of the newer information. This RFI Workplan was to have been submitted to the DTSC by October 2, 2006, and was to have included the following: all historical records and documentation of all activities at the AIBP; a listing of waste types and locations from which they came; and an explanation of the rationale for the development of the RFI Workplan based on an evaluation of all records. Boeing was also to include a signed certification that a thorough records search was completed.

The document submitted by Boeing did not include a complete records search and a signed certification by Boeing was not included. The cover letter for the September 29, 2006 Draft Workplan states that Boeing will complete its review of additional relevant documents by November 13, 2006, and that a revised RFI Workplan will be submitted to DTSC no later than November 30, 2006. In a phone call with Boeing representatives on September 28, 2006, Mr. Watson Gin and Ms. Barbara Coler stated emphatically that partial and incomplete submittals would not be acceptable. They also made it clear that

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Boeing should submit all information even if incomplete on October 2, 2006 and include a partial signed certification. DTSC did not agree to Boeing submitting a Draft Workplan in separate portions, nor did we agree to an extension of the due date. Submitting the remaining portion of the RFI Workplan by November 30, 2006 is unacceptable. It is unacceptable that the records search remains incomplete and that the certification has not been submitted to date.

The Draft Workplan references the August 2006 *Radiological Screening Procedure* as the basis for screening soils for radioactivity. The referenced radiological screening procedure is clearly identified for excavated material, not for site characterization purposes as it should be. Boeing shall re-write the radiological screening procedures for site characterization purposes, seek concurrence from the Department of Health Services, Radiologic Health Branch (DHS RHB), and include the new procedure in the Workplan as an Appendix.

In addition, the following items are missing from the document:

1) Table IX (referenced on page 16)
2) Appendix B – Historical Operations Documentation
3) Appendix C – Historical Analytical Results for the TTF and Area I Burn Pit and Recent sampling Laboratory Report and Data Validation Report
4) Appendix D - Recent correspondence and Biological, Cultural, and Paleontological Resource Assessment. radiological surveying documentation
5) Appendix E – AIBP Area Addendum HASP, QAPP
6) The signed certification form (enclosed again)

Boeing shall incorporate the items described in this letter and submit a Final RFI Workplan and the associated materials immediately. Should Boeing continue to delay, DTSC will be evaluating enforcement options. When DTSC receives the Final RFI Workplan, we will conduct a review for technical adequacy.

If you have questions regarding this letter please contact Mr. Peter Bailey of my staff at (916) 255-3602.

Sincerely,

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